

Michael J. Farrell, OSB No. 902587  
Email: [mfarrell@martinbischoff.com](mailto:mfarrell@martinbischoff.com)  
Thomas W. Purcell, OSB No. 114938  
Email: [tpurcell@martinbischoff.com](mailto:tpurcell@martinbischoff.com)  
MARTIN BISCHOFF TEMPLETON  
LANGSLET & HOFFMAN LLP  
888 SW Fifth Avenue, Suite 900  
Portland, Oregon 97204  
Telephone: (503) 224-3113  
Facsimile: (503) 224-9471

Attorneys for Defendant Homesales, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

JAMES J. RIGGS and CELESTE L. RIGGS,  
individuals,

Plaintiffs,  
v.

HOMESALES, INC, an Oregon foreign  
business corporation; WELLS FARGO  
BANK, N.A., a nationally chartered bank; and  
NORTHWEST TRUSTEE SERVICES, INC.,  
an Oregon foreign business corporation  
incorporated in Washington state,

Defendants.

Case No. 3:12-cv-00289-SI

DEFENDANT HOMESALES, INC'S  
SECOND UNOPPOSED MOTION FOR  
FURTHER STAY OF LITIGATION

**LR 7-1 CERTIFICATE OF COMPLIANCE**

Counsel for Defendant Homesales Inc. ("Homesales"), certifies that he conferred in good faith with Plaintiffs' counsel and counsel for Defendants Wells Fargo Bank, N.A. ("Wells Fargo") and Northwest Trustee Services, Inc. ("NWTS") regarding the issues presented in this motion, and that Plaintiffs, Wells Fargo, and NWTS consent to this motion.

///

Page 1 –

DEFENDANT HOMESALES, INC'S SECOND  
UNOPPOSED MOTION FOR FURTHER STAY OF  
LITIGATION

MARTIN, BISCHOFF, TEMPLETON,  
LANGSLET & HOFFMAN LLP  
Attorneys at Law  
888 SW Fifth Avenue, Suite 900  
Portland, OR 97204  
Telephone (503) 224-3113  
Fax (503) 224-9471

**MOTION**

Pursuant to Fed. R. Civ. P. 6(b), Homesales requests the Court issue an order staying this matter for an additional sixty (60) days while Plaintiffs and Defendants finalize their settlement of this matter. This court previously granted Homesales Motion for Stay up and through February 14, 2013. The deadline for dispositive motion is currently set for March 8, 2013.

The parties have agreed in substance to a settlement of this matter and are currently finalizing the details of their settlement. The purpose of this motion is to preserve the parties' ability to file dispositive motions should any problems arise during the final settlement process.

This motion is not made for the purpose of delay.

DATED: March 8, 2013.

MARTIN, BISCHOFF, TEMPLETON,  
LANGSLET & HOFFMAN, LLP

By: s/ Thomas W. Purcell  
Michael J. Farrell, OSB No. 902587  
Email: [mfarrell@martinbischoff.com](mailto:mfarrell@martinbischoff.com)  
Thomas W. Purcell, OSB No. 114938  
Email: [tpurcell@martinbischoff.com](mailto:tpurcell@martinbischoff.com)  
888 SW Fifth Avenue, Suite 900  
Portland, Oregon 97204  
Attorneys for Defendant Homesales, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that, on this date, I filed the foregoing DEFENDANT HOMESALES, INC'S SECOND UNOPPOSED MOTION FOR FURTHER STAY OF LITIGATION via the U.S. District Court's CM/ECF Electronic Filing System.

I further certify that by filing said document via U.S. District Court's CM/ECF Electronic Filing System, a copy thereof was served by either electronic notice through ECF or by mailing to said individuals a true copy thereof, addressed to their last known regular address and deposited in the Post Office at Portland, Oregon as on the following parties:

Thomas H. Cutler  
Harris Berne Christensen LLP  
500 S.W. Meadows Rd., Suite 400  
Lake Oswego, OR 97035

Telephone:  
Facsimile: 503.968.2003  
Email: [thomas@hbslawyers.com](mailto:thomas@hbslawyers.com)  
Attorney for Plaintiffs

John Thomas  
Routh Crabtree Olsen PC  
621 SW Alder Street, Suite 800  
Portland, Oregon 97205

Telephone: 503.977.77926  
Facsimile: 503.977.7963  
Email: [tshill@rcolegal.com](mailto:tshill@rcolegal.com)

Attorneys for Northwest Trustee Services,  
Inc.

DATED: March 8, 2013.

MARTIN, BISCHOFF, TEMPLETON,  
LANGSLET & HOFFMAN, LLP

By: /s/ Thomas W. Purcell  
Michael J. Farrell, OSB No. 902587  
Email: [mfarrell@martinbischoff.com](mailto:mfarrell@martinbischoff.com)  
Thomas W. Purcell, OSB No. 114938  
Email: [tpurcell@martinbischoff.com](mailto:tpurcell@martinbischoff.com)  
888 SW Fifth Avenue, Suite 900  
Portland, Oregon 97204  
Telephone: 503.224.3113  
Facsimile: 503.224.9471  
Attorneys for Defendant Homesales, Inc.